

**U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: NORLEEN WILLIAMS : CHAPTER 13**  
**Debtor : BANKRUPTCY NO. 18-15210**

**MOTION TO EXTEND 30 DAY STAY**

The Debtor requests that the automatic stay arising from the above bankruptcy case filing be continued beyond the 30-day period set forth in 11 U.S.C. section 362(c)(3) for the following reasons:

1. Debtor filed this Chapter 13 bankruptcy case on August 6, 2018.
2. The Debtor has filed a prior bankruptcy case at Bankruptcy No. 17-10514, which was dismissed on July 18, 2018.
3. The Debtors request that the stay be extended because they have filed this case in good faith, to prevent the sheriff sale of their home.
4. During their prior bankruptcy, debtor had lost her job, causing her to default on post-petition mortgage payments, as well as her trustee payments.
5. Debtor has since regained employment and is receiving additional contributions from family members, allowing her to complete her Chapter 13 Plan.
6. The continuation of the automatic stay is necessary to prevent the sheriff sale of their home.

WHEREFORE, the Debtor requests that this Court will grant the instant Motion requesting to extend the automatic stay beyond 30 days and for the duration of this case.

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